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MEMO ENDORSED

September 5, 2023

**Via ECF**

The Honorable Nelson S. Roman  
United States District Judge  
Southern District of New York  
300 Quarropas St.  
White Plains, New York 10601-4150

**Re: *Dail Moses-Taylor v. Greyston Foundation, Inc.*, Case No. 1:21-cv-06756**

Dear Judge Roman:

We represent the Plaintiff Dail Moses-Taylor in the above-referenced matter. Consistent with past practice, Defendant has violated yet another Court-ordered deadline (August 30, 2023 to respond to Plaintiff's August 24 letter motion, *see* Dkt. 69) and Plaintiff still has not received the long overdue settlement sums, nor any communication from Defendant's counsel regarding the status of the payments. As described in Plaintiff's prior correspondence to the Court (*see, e.g.*, Dkts. 61, 63, 67, 68), it is clear that Defendant and its counsel feel entitled to violate their legal obligations and otherwise have no respect for this Court or the judicial process. It is also clear that Defendant has no intention of honoring the parties' Agreement and paying the settlement sums. Given these grossly unfair but sadly predictable circumstances, Plaintiff respectfully asks that the Court grant her pending letter motion seeking enforcement of the parties' Agreement and ordering Defendant or its counsel to pay sanctions (*see* Dkt. 68).

We thank the Court for its consideration of this matter.

**Plaintiff's request is GRANTED to the extent Plaintiff is granted leave to file a motion for enforcement of the settlement agreement at ECF No. 59. The briefing schedule is as follows: Plaintiff's motion is to be served, not filed, by Oct. 5, 2023; Defendant's opposition is to be served, not filed, by Nov. 6, 2023; and Plaintiff's reply is to be served by Nov. 21, 2023. All moving papers are to be filed on Nov. 21, 2023.**

SO ORDERED:

Dated: September 5, 2023

White Plains, New York

cc: All Parties (via ECF)

Respectfully submitted,

Allison L. Van Kampen  
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New York, NY 10017  
*Counsel for the Plaintiff*

HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE